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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JOSE ADAN CHAIDEZ OJEDA,  
  
Defendant.

CASE NO. 1:22-CR-00297-JLT-BAM  
  
STIPULATION TO VACATE STATUS  
CONFERENCE AND SET CHANGE OF PLEA  
HEARING; ORDER

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on 6/26/2024.
2. By this stipulation, defendant now moves to vacate the status conference as to Jose Adan Chaidez Ojeda only, and set this matter for a change of plea on 8/26/2024 and to exclude time between 6/26/2024, and 8/26/2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]..
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes thousands of pages of investigative reports, video, audio recordings, cell phone extractions, and other voluminous materials. Supplemental discovery has been either produced directly to counsel or made available for inspection and copying.

b) Counsel for defendant desires additional time to consult with his client, prepare for the change of plea hearing, and gather evidence in mitigation for the sentencing hearing.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of 6/26/2024 to 8/26/2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Date: June 18, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ Antonio J. Pataca  
ANTONIO J. PATACA  
Assistant United States Attorney

Date: June 18, 2024

/s/ Patrick Aguirre  
PATRICK AGUIRRE  
Counsel for Defendant  
JOSE ADAN CHAIDEZ OJEDA

**ORDER**

IT IS SO ORDERED that the status conference set for June 26, 2024, is vacated. A change of plea hearing is set for **August 26, 2024, at 9:00 a.m. in Courtroom 4 before District Court Judge Jennifer L. Thurston**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: **June 18, 2024**

/s/ *Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE